



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

MAY 04 2016

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL 7009 1680 0000 7663 6049**  
**RETURN RECEIPT REQUESTED**

Mr. James Smith  
Director – Safety Health Environmental Affairs  
Heligear Acquisition Co. d/b/a  
Northstar Aerospace (Chicago), Inc.  
6006 West 73<sup>rd</sup> Street  
Bedford Park, Illinois 60638-6106

Re: Notice of Violation  
Compliance Evaluation Inspection  
ILR 000 009 795

Dear Mr. Smith:

On June 11, 2015 a representative of the U.S. Environmental Protection Agency inspected the Northstar Aerospace (Chicago), Inc. (Northstar) facility located in Bedford Park, Illinois. As a “large quantity generator” of hazardous waste, Northstar is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate Northstar’s compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Northstar, EPA’s review of records pertaining to Northstar, and the inspector’s observations, EPA has determined that Northstar has unlawfully stored hazardous waste without a permit or interim status as a result of Northstar’s failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which Northstar was out of compliance at the time of the inspection in paragraphs 1 through 5, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 3, 4 and 5 are also independent TSD requirements

incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of Northstar to comply with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Ill. Admin. Code tit. 35 Part 724 [40 C.F.R. Part 264] (if the facility should have been permitted).

#### **STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS**

##### **1. Satellite Accumulation**

Under Ill. Admin. Code tit. 35 §§ 722.134(c)(1)(i) and (ii); 35 § 725.273(a) and [40 C.F.R. §§ 262.34(c)(1)(i) and (ii); 40 C.F.R. § 265.173(a)], a generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste without a permit or interim status, provided that the container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste; and that the container holding hazardous waste must be marked with either the words, "Hazardous Waste," or with other words that identify the contents of the containers.

At the time of the inspection, Northstar was storing one open 55-gallon container of hazardous waste in one satellite accumulation area (SAA), when waste was not being added to or removed from the container. The container also did not contain the words, "Hazardous Waste," or words that identified the contents of the container. *See*, Inspection Report, page 2, Site Inspection, paragraph 1.

In addition, Northstar was storing one open container of hazardous waste in an SAA area in the laboratory when waste was not being added to or removed from the container. *See*, Inspection Report, page 3, Site Inspection, paragraph 4.

##### **2. Accumulation Date**

Under Ill. Admin. Code tit. 35 § 722.134(a)(2) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must ensure the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

At the time of the inspection, Northstar was storing two totes of hazardous waste, located in the hazardous waste storage area, without dates of accumulation marked on the containers. *See*, Inspection Report, page 2, Site Inspection, paragraph 2.

Northstar was also storing several 55-gallon containers of hazardous waste with labels that were not visible for inspection on each container. *See*, Inspection Report, page 2, Site Inspection, paragraph 2.

### 3. Contingency Plan

Under Ill. Admin. Code tit. 35 § 722.134(a)(4); Subpart D, 35 § 725.153(a) [40 C.F.R. § 262.34(a)(4); Subpart D, § 265.53(a)], a copy of the contingency plan and all revisions to the plan must be maintained at the facility.

At the time of the inspection, Northstar was not maintaining a copy of the Contingency Plan at the facility. *See*, Inspection Report, page 4, Records Review, item 4.

### 4. Training

Under Ill. Admin. Code tit. 35 IAC § 722.134(a)(4); 35 IAC § 725.116(a)(2), (b), (c), (d) and (e) [40 CFR § 262.34(a)(4); 40 C.F.R. § 265.16(a)(2), (b), (c), (d) and (e)], a generator of hazardous waste must successfully complete a program of classroom instruction or on-the-job training of facility personnel that teaches them to perform their duties in a way that ensures the facility's compliance.

At the time of the inspection, Northstar's training program: 1) did not include contingency plan implementation; 2) did not include documentation that facility personnel successfully completed the program required within six months after the effective date of their employment or assignment to a facility, or to a new position at a facility, whichever is later; 3) did not include documentation that facility personnel took part in an annual review of the initial training required; 3) did not include job titles, job descriptions or a written description of the type and amount of both initial training and continuing training that will be given to each person filling a position dealing with hazardous waste management; 4) did not document that the training or job experience required had been given to, and completed by, facility personnel; and, 5) did not maintain training records of former employees for at least three years from the last date of employment. *See*, Inspection Report, page 3, Records Review, item 1.

### 5. Inspections

Under Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(A) and 725.274 [40 C.F.R. §§ 262.34(a)(1)(i) and 265.174], at least weekly, the owner or operator must inspect areas where containers are stored.

At the time of the inspection, Northstar was not conducting weekly inspections of the hazardous waste storage area. *See*, Inspection Report, page 4, Records Review, item 7.

**Summary:** By failing to comply with the conditions for a permit exemption, above, Northstar became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. Northstar failed to apply for such a permit. Northstar's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from

Ill. Admin. Code tit. 35 Part 725 is also an independent violation of the corresponding TSD requirement.

#### OTHER VIOLATIONS

##### 6. Land Disposal Notification

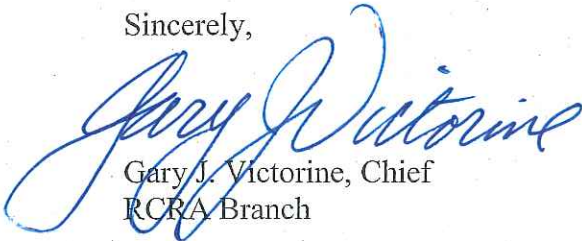
Under Ill. Admin. Code tit. 35 IAC § 728.107(a)(8) [40 CFR § 268.7(a)(8)], a generator of hazardous waste must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to Land Disposal Restrictions.

At the time of the inspection, Northstar did not maintain a copy of the land disposal restriction notification for the hazardous waste that is the subject of such documentation. See, Inspection Report, page 4, Records Review, item 3.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than thirty (30) days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and requirements. You should submit your response to Ms. Jamie Paulin, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Paulin, of my staff, at 312-886-1771, or at [paulin.jamie@epa.gov](mailto:paulin.jamie@epa.gov).

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA, ([todd.marvel@illinois.gov](mailto:todd.marvel@illinois.gov))





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

**SITE NAME:** Northstar Aerospace (Chicago), Inc.  
Heligear Acquisition Co. d/b/a

**EPA ID No.:** ILR 000 009 795

**LOCATION ADDRESS:** 6006 West 73<sup>rd</sup> Street  
Bedford Park, Illinois 60638-6106

**NAICS CODE(S):** 336413 [Other Aircraft Parts and Auxiliary Equipment  
Manufacturing]

**DATE OF INSPECTION:** June 11, 2015

**EPA INSPECTOR:** Jamie L. Paulin  
Chemist  
LR-8J  
Compliance Section 1  
(312) 886-1771 Direct  
(312) 353-4788 Facsimile  
paulin.jamie@epa.gov

**PREPARED BY:** Jamie L. Paulin  
Jamie L. Paulin  
Chemist  
8/3/15  
Date

**APPROVED BY:** Michael Cunningham  
Michael Cunningham, Section Chief  
Compliance Section 1  
RCRA Branch  
8/4/15  
Date

## INTRODUCTION:

The purpose of the inspection was to conduct an un-announced Compliance Evaluation Inspection (CEI) at the Northstar Aerospace (Chicago), Inc. (Northstar) facility, located at 6006 West 73<sup>rd</sup> Street, Bedford Park, Illinois, to examine Northstar's management of its Resource Conservation and Recovery Act (RCRA) regulated waste, and to determine Northstar's compliance with RCRA, including used oil regulations.

Northstar notified EPA of its hazardous waste activities as a large quantity generator on or about March 1, 1998. They mainly operate electroplating operations and manufacture aircraft parts and auxiliary equipment. Most of the rinse waters and plating baths are treated via the waste water treatment unit (WWTU) on-site where F006 hazardous waste filter cake sludge is generated. The discharge is pumped to the Metropolitan Water Reclamation District of Greater Chicago.

Northstar was last inspected by the Illinois Environmental Protection Agency (IEPA) on September 30, 2009. However, they filed for bankruptcy in 2012 and the company is now owned and operated by Heligear Acquisition Co. d/b/a.

## OPENING CONFERENCE:

I entered the Northstar facility at 10:00 am on June 11, 2015. I introduced myself, presented my credentials, and described the purpose of my visit. The receptionist contacted Mr. Bruno Kolb, Facility Maintenance Manager. Mr. Kolb put me on the phone with Mr. James Smith, Director - Safety Health Environmental Affairs, to discuss the inspection. Mr. Smith said that he would help to put the records together; however he was not in the office at the time of the inspection.

Mr. Smith did not make a CBI claim on the information gathered during the inspection or on the photos taken, documents copied and/or verbal information provided.

After our discussion, we began the physical site inspection immediately following the opening conference.

## SITE INSPECTION:

Mr. Kolb escorted me on the physical site inspection, which began in the Paint Booth Area. One 55-gallon container storing hazardous waste was being stored as a satellite accumulation area (SAA) container. The container was not closed and did not have words identifying the contents of the container. *See*, photographs 1 and 2.

We then proceeded to the hazardous waste storage area. Two totes were storing hazardous waste located in this area; however, the containers were not marked with dates of accumulation. Several 55-gallon containers of hazardous waste were also stored in this area; however the labels

were turned in and were difficult to view. The dates of accumulation were difficult to read. *See*, photographs 3 through 7.

Mr. Kolb introduced me to Ms. Yvonne Reno, Materials and Process Engineer, after inspecting the hazardous waste storage area. Ms. Reno showed me the plating lines. Northstar operates several plating lines, including a black oxide line and an Allodine Line. Cyanide is used in one of the lines. The lines are situated on a platform. A trench is located underneath the grating. Rinse waters and drippings are collected in the trenches and then flushed to the WWTU. *See*, photographs 8 and 9.

Ms. Reno introduced me to Mr. Richard Musil, Environmental Technical Specialist, who showed me the laboratory. One SAA container was located near the sink. The container was storing non-cyanide hazardous waste and was open at the time of the inspection. Once the container is full, the hazardous waste is placed into a tote for storage in the hazardous waste storage area. A separate SAA container was storing cyanide hazardous waste and was located in a separate area in the laboratory. *See*, photographs 10 and 11.

Mr. Musil escorted me to the WWTU. A 55-gallon container of filters, collected from the WWTU, was located in this area. The hazardous waste filter cake, F006, was being collected in a cubic yard fiber box from the filter press. The container was open because the operator had just dropped hazardous waste into the container. *See*, photographs 12 through 14.

This area was the last to be inspected. We returned to the front office. However, Mr. Musil explained that he was not certain where the records were stored and that Mr. Jim Smith would be emailing me the records.

## **RECORDS REVIEW:**

No employee on-site had access to the RCRA records. Mr. Smith sent me some RCRA records via email.

### **1. Personnel Training**

Northstar did not have job titles for each position at the facility related to hazardous waste management; the name of the employee filling each job; written job descriptions for each position related to hazardous waste management; a written description of the training provided; or records that document that the training or job experience required has been given to, and completed by, facility personnel.

They were not providing RCRA training on an annual basis and not providing training to new employees within six months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later.

Lastly, they were not providing contingency plan implementation training.

## **2. Manifests**

Mr. Smith sent me copies of the manifests for the years 2014 and 2015 via email on 6/21/15.

There were no issues with the manifests I reviewed for shipments for off-site disposal. Northstar was sending the hazardous waste to Safety-Kleen Systems, Inc. and EQ Detroit for disposal.

## **3. Waste Analysis and Recordkeeping**

I observed that Northstar did not have, as a record on-site, a land disposal restriction (LDR) notification form for shipments of hazardous waste.

## **4. Contingency Plan**

A Contingency Plan was not available for my review during the inspection; however, Mr. Smith provided it to me on 8/3/2015 via email. The plan revision date was 1/1/2015. The plan did contain all of the elements required under 35 IAC § 725.152 [40 CFR § 265.52].

## **5. Preparedness and Prevention**

Arrangements with local emergency authorities, contractors, or local hospitals were available and were included within the contingency plan.

## **6. Annual Reporting**

Northstar filed an annual report with IEPA by March 1 for the reporting years of 2013 and 2014. The records were not available at the time of the inspection; however, Mr. Smith did provide them to me on 8/3/2015 via email. Heligear Acquisition Co has only been in existence since 2012; therefore these are the only two viable reports under the new company.

They are currently listed as an LQG within the EPA's RCRAInfo database.

## **7. Weekly and Daily Inspections**

Northstar was not conducting weekly inspections of the hazardous waste storage area.

## **CLOSING CONFERENCE:**

I conducted the closing conference with Mr. Musil. I explained to him that I would need to review my notes and photographs before making any compliance decisions. I also explained that



I would submit a copy of my inspection report along with the photo log to Northstar. I asked Mr. Musil to have Mr. Smith send me the RCRA records as quickly as possible.

I departed Northstar around 12:00pm.

**ATTACHMENT:** (2)

Attachment 1	Photographs taken during the time of the inspection.
Attachment 2	Inspection Check list

**ENCLOSURE:** (1)



# Photographs for Northstar Aerospace CEI 6/11/15

**Media: RCRA**

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*Disk Number* 1  
*Photo Number* 1  
*Photo Filename* DSCN0803.JPG  
*Date/Time* 6/11/2015  
11:00:00 AM  
*Photographer* Jamie Paulin

## *Description*

Paint Booth Satellite Accumulation Area (SAA) 55-gallon container. Container was open. No words identifying the contents of the container were located on the container.



*Disk Number* 1  
*Photo Number* 2  
*Photo Filename* DSCN0804.JPG  
*Date/Time* 6/11/2015  
11:04:00 AM  
*Photographer* Jamie Paulin

## *Description*

Paint Booth Satellite Accumulation Area (SAA) 55-gallon container. Container was open. No words identifying the contents of the container were located on the container.





# Photographs for Northstar Aerospace CEI 6/11/15

Media: RCRA

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*Disk Number* 1  
*Photo Number* 3  
*Photo Filename* DSCN0805.JPG  
*Date/Time* 6/11/2015  
11:04:00 AM  
*Photographer* Jamie Paulin

## Description

Hazardous Waste Storage Area. Two totes, storing hazardous waste, did not contain dates of accumulation on the containers.



*Disk Number* 1  
*Photo Number* 4  
*Photo Filename* DSCN0806.JPG  
*Date/Time* 6/11/2015  
11:05:00 AM  
*Photographer* Jamie Paulin

## Description

Hazardous Waste Storage Area. View of hazardous waste label without a date of accumulation. Two totes of hazardous waste were being stored without dates.







## Photographs for Northstar Aerospace CEI 6/11/15

### Media: RCRA

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*Disk Number* 1  
*Photo Number* 5  
*Photo Filename* DSCN0807.JPG  
*Date/Time* 6/11/2015  
11:05:00 AM  
*Photographer* Jamie Paulin

#### Description

Hazardous Waste Storage Area. 55-gallon containers were being stored with hazardous waste labels. However, the labels were turned in and difficult to view. It was also difficult to read the dates of accumulation.



*Disk Number* 1  
*Photo Number* 6  
*Photo Filename* DSCN0808.JPG  
*Date/Time* 6/11/2015  
11:06:00 AM  
*Photographer* Jamie Paulin

#### Description

Hazardous Waste Storage Area. 55-gallon containers were being stored with hazardous waste labels. However, the labels were turned in and difficult to view. It was also difficult to read the dates of accumulation.





## Photographs for Northstar Aerospace CEI 6/11/15

### Media: RCRA

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*Disk Number* 1  
*Photo Number* 7  
*Photo Filename* DSCN0809.JPG  
*Date/Time* 6/11/2015  
11:06:00 AM  
*Photographer* Jamie Paulin

#### Description

Hazardous Waste Storage Area. 55-gallon containers were being stored with hazardous waste labels. However, the labels were turned in and difficult to view. It was also difficult to read the dates of accumulation.



*Disk Number* 1  
*Photo Number* 8  
*Photo Filename* DSCN0810.JPG  
*Date/Time* 6/11/2015  
11:14:00 AM  
*Photographer* Jamie Paulin

#### Description

Plating Line Trench. The trench collects rinse waters and drippage from the plating line. Then the material travels to the waste water treatment unit. (black oxide)







# Photographs for Northstar Aerospace CEI 6/11/15

## Media: RCRA

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*Disk Number* 1  
*Photo Number* 9  
*Photo Filename* DSCN0811.JPG  
*Date/Time* 6/11/2015  
11:18:00 AM  
*Photographer* Jamie Paulin

### Description

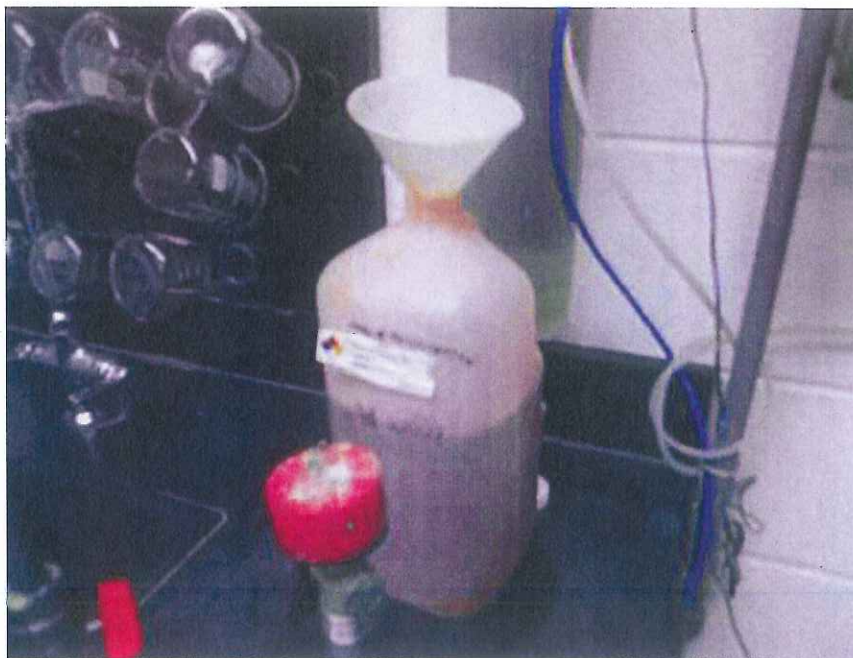
Allodine Line. Waste waters are collected into trench and then flushed to the waste water treatment unit.



*Disk Number* 1  
*Photo Number* 10  
*Photo Filename* DSCN0812.JPG  
*Date/Time* 6/11/2015  
11:21:00 AM  
*Photographer* Jamie Paulin

### Description

Laboratory SAA container. The container was storing non-cyanide hazardous waste and was open. The hazardous waste is placed into a tote for storage in the hazardous waste storage area once the container is full.







# Photographs for Northstar Aerospace CEI 6/11/15

## Media: RCRA

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*Disk Number* 1  
*Photo Number* 11  
*Photo Filename* DSCN0813.JPG  
*Date/Time* 6/11/2015  
11:21:00 AM  
*Photographer* Jamie Paulin

### Description

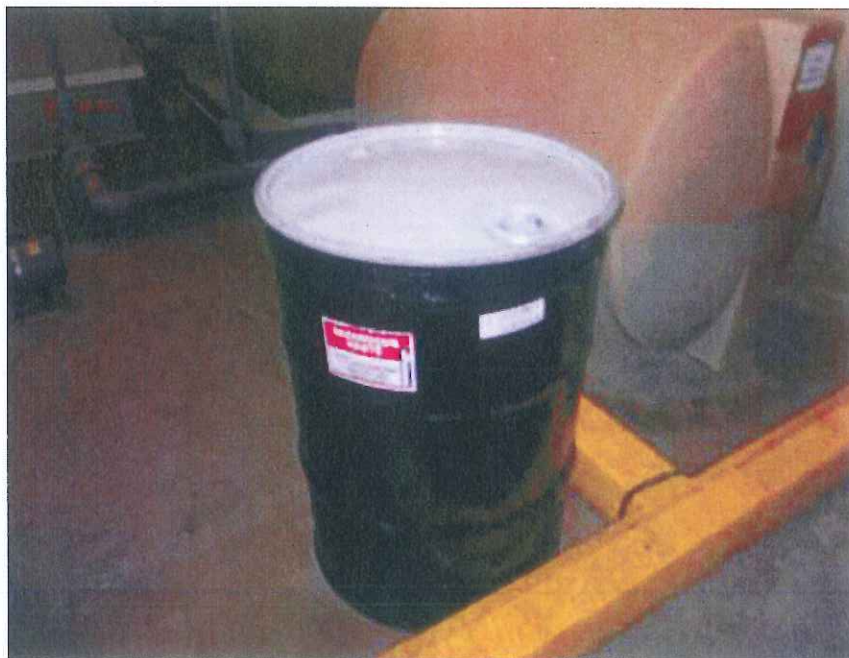
Laboratory SAA container. Cyanide hazardous waste storage.



*Disk Number* 1  
*Photo Number* 12  
*Photo Filename* DSCN0814.JPG  
*Date/Time* 6/11/2015  
11:26:00 AM  
*Photographer* Jamie Paulin

### Description

Waste water treatment unit (WWTU) area.  
An SAA 55-gallon container was storing  
filters collected from the WWTU.





# Photographs for Northstar Aerospace CEI 6/11/15

**Media: RCRA**

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*Disk Number* 1  
*Photo Number* 13  
*Photo Filename* DSCN0815.JPG  
*Date/Time* 6/11/2015  
11:28:00 AM  
*Photographer* Jamie Paulin

## *Description*

WWTU area. Hazardous waste filter cake was being collected in a fiber box from the filter press. F006 hazardous waste.



*Disk Number* 1  
*Photo Number* 14  
*Photo Filename* DSCN0816.JPG  
*Date/Time* 6/11/2015  
11:28:00 AM  
*Photographer* Jamie Paulin

## *Description*

WWTU area. Hazardous waste filter cake was being collected in a fiber box from the filter press. F006 hazardous waste. The container was opened because the operator had just dropped hazardous waste into the container.





Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (&gt;1000 KG/MO.)</b>	
	<b>SUBPART A: GENERAL</b>	
722.111	<b>Section 722.111 Hazardous Waste Determination</b> Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Have hazardous wastes been identified for purposes of compliance with Part 722? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.111
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
722.112(a)	<b>Section 722.112 USEPA Identification Numbers</b> Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
	<b>SUBPART B: THE MANIFEST</b>	
722.120(a)	<b>Section 722.120 General Requirements</b> Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
	<b>Section 722.121 Acquisition of Manifests</b> Has the generator used:	722.120(d)
722.121(a)	- an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
722.122	<b>Section 722.122 Number of Copies</b> Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	<b>Section 722.123 Use of the Manifest</b> For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
	- retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
		722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b>	
722.130	Is there any hazardous waste ready for transport off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a))	<b>Section 722.134 Accumulation Time</b> Has the generator complied with the following requirements: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:  Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", go to Subpart J.	
	<b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b>	
(725.211)	Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?  Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Note:</b> See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>COMMENTS:</p>	
(725.278)	<p><b>Section 725.278 Air Emission Standards</b></p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>	
	<p>Does the generator accumulate and/or treat hazardous waste in tanks?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Note:</b> If "No", go to Subpart C.</p>	
	<p><b>SUBPART J: TANK SYSTEMS</b></p> <p>Has the generator closed an accumulation area?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.211
(725.211) (725.214)	<p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.214
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Note:</b> A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks <b>existing</b> prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____ 3) existing corrosion protection measures? Yes _____ No _____ N/A _____ 4) documented age of the tank system? Yes _____ No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____  *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____  <b>Note:</b> If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For <b>new</b> tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service?  Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89?  Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later?  Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95?  Yes _____ No _____ N/A _____</p> <p>or  if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later?  Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87?  Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?  Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?  Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> <li>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure?  Yes _____ No _____ N/A _____</li> <li>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift?  Yes _____ No _____ N/A _____</li> <li>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours?  Yes _____ No _____ N/A _____</li> <li>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation?  Yes _____ No _____ N/A _____</li> </ol> <p>and  is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> <li>1) a liner (external to the tank); or</li> <li>2) a vault; or</li> <li>3) a double-walled tank; or</li> <li>4) an equivalent device (approved by the Board)?  Yes _____ No _____ N/A _____</li> </ol>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)?  Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) overflow prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(c))	<p><b>Note:</b> If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overflow/spill control equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release?  Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection?  Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water?  Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release?  Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system?  Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment?  Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair?  Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection?  Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]?  Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?  Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system?  Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:  - the resulting waste, mixture or dissolved material is no longer ignitable or reactive?  Yes _____ No _____ N/A _____</p> <p>- Section 725.117(b) is complied with?  Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction?  Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies?  Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line?  Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank?  Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with?  Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with?  Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p><b>Section 725.302 Air Emission Standards</b></p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725?  Yes _____ No _____ N/A _____</p> <p>Comments:</p>	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	<b>SUBPART C: PREPAREDNESS AND PREVENTION</b> Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b>	
(725.151(a))	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)				Violation
(725.152(c))	Does the plan describe arrangements with: <ul style="list-style-type: none"> <li>- police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>				
(725.152(d))	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.152(e))	Does the plan identify all emergency equipment including: <ul style="list-style-type: none"> <li>- description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul> Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.152(f))	Does the plan include: <ul style="list-style-type: none"> <li>- an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>				
(725.153)	Has the contingency plan (including all revisions) been: <ul style="list-style-type: none"> <li>a) maintained at the facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>b) submitted to:               <ul style="list-style-type: none"> <li>- police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul> </li> </ul>				★
(725.154)	Has the contingency plan been reviewed and revised whenever: <ul style="list-style-type: none"> <li>a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>b) the plan fails in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>c) the facility changes in a way that modifies the emergency response necessary?                Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </li> <li>d) information regarding emergency coordinators changes?                Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </li> <li>e) information regarding equipment changes?                Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </li> </ul>				
(725.155)	Is the emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
	<b>Note:</b> If the facility has had a release, explain in detail.				

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p><b>Section 725.116 Personnel Training</b></p> <p>Does the facility have a training program? Yes _____ No <u>✓</u> N/A _____</p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes _____ No <u>✓</u> N/A _____</p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes _____ No _____ N/A <u>✓</u></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes _____ No <u>✓</u> N/A _____</p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> <li>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes _____ No _____ N/A <u>✓</u></li> <li>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes _____ No _____ N/A <u>✓</u></li> <li>- key parameters for automatic waste feed cut-off systems? Yes _____ No _____ N/A <u>✓</u></li> <li>- communications or alarm systems? Yes _____ No <u>✓</u> N/A _____</li> <li>- response to fire or explosions? Yes _____ No <u>✓</u> N/A _____</li> <li>- response to groundwater contamination incidents? Yes _____ No _____ N/A <u>✓</u></li> <li>- shutdown of operations? Yes _____ No _____ N/A <u>✓</u></li> </ul>	<u>✓</u>
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes _____ No <u>✓</u> N/A _____</p>	<u>✓</u>
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes _____ No <u>✓</u> N/A _____</p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes _____ No <u>✓</u> N/A _____</li> <li>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes _____ No <u>✓</u> N/A _____</li> <li>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes _____ No <u>✓</u> N/A _____</li> <li>4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes _____ No <u>✓</u> N/A _____</li> </ol>	<u>✓</u>
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes _____ No <u>✓</u> N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	<b>Section 728.107 Waste Analysis and Recordkeeping</b> Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No <input checked="" type="checkbox"/> N/A _____	*
722.134(c)	<b>Section 722.134 Satellite Accumulation</b> Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes _____ No <input checked="" type="checkbox"/> N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <input checked="" type="checkbox"/> No _____ N/A _____ If there are more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A <input checked="" type="checkbox"/> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	*
722.134(g)	<b>Note:</b> A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.  <b>SUBPART D: RECORDKEEPING AND REPORTING</b>	
722.140(a)	<b>Section 722.140 Recordkeeping</b> Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.140(d)
722.141(a)	<b>Section 722.141 Annual Reporting</b> Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.141(a)
	<b>Note:</b> If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>Section 722.142 Exception Reporting</b>	722.141(b)
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(1)
	<b>Section 722.143 Additional Reporting</b>	722.142(a)(2)
722.143	Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b>	722.143
722.150	Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b>	722.150
722.160	Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	<b>SUBPART G: FARMERS</b>	722.160
722.170	Is the generator a farmer? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	COMMENTS:	722.170



## US EPA Region 5 Document Log

EPA Inspector:  
Jamie L. Paulin

Production Area	Description	Area Requested From	Date Received	EPA Document Number	CBI Claimed	Pages Obtained
General	Copies of final signed manifests 2014	Records	6/21/2015	JP-na-01-15	No	26
General	Copies of final signed manifests 2015	Records	6/21/2015	JP-na-02-15	No	21
General	Hazardous Waste Contingency Plan	Records	8/3/2015	JP-na-03-15	No	5
General	Emergency Evacuation	Records	8/3/2015	JP-na-04-15	No	4
General	Outside Evacuation Area Map	Records	8/3/2015	JP-na-05-15	No	1
General	Assigned Evacuation Door Map	Records	8/3/2015	JP-na-06-15	No	1
General	Tier II Chemical Storage and use	Records	8/3/2015	JP-na-07-15	No	1
General	Evacuation Coordinators, Evacuation Doors and Evacuation Areas	Records	8/3/2015	JP-na-08-15	No	1
General	IEPA 2014 Hazardous Waste Report	Records	8/3/2015	JP-na-09-15	No	31
General	IEPA 2013 Hazardous Waste Report	Records	8/3/2015	JP-na-10-15	No	18



